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10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 MAXIMILIAN KLEIN, et al.,

14 Plaintiffs,

15 vs.  
16

17 META PLATFORMS, INC.,

18 Defendant.

19 This Document Relates To: All Actions  
20

Consolidated Case No. 3:20-cv-08570-JD

**DECLARATION OF ADAM B. WOLFSON  
IN SUPPORT OF CONSUMER  
PLAINTIFFS' MOTION TO EXCLUDE  
ANINDYA GHOSE'S PROPOSED  
TESTIMONY REGARDING THE *BROWN  
SHOE* FACTORS AND FACEBOOK'S  
MONOPOLY POWER**

The Hon. James Donato

Hearing Date: June 20, 2024 at 10:00 a.m.  
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I, Adam B. Wolfson, declare:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”). I have been actively involved in this action, am familiar with the proceedings, and have personal knowledge of the matters stated herein.

2. I respectfully submit this declaration in support of Consumer Plaintiffs’ Motion to Exclude Anindya Ghose’s Proposed Testimony Regarding the *Brown Shoe* Factors and Facebook’s Monopoly Power. Attached to this declaration are true and correct copies of **Exs. 1–3**, which are documents and deposition transcripts that Consumer Plaintiffs cite in their Motion. For the Court’s convenience, the relevant portions of the documents and deposition transcripts have been highlighted and, where applicable, excerpted.<sup>1</sup>

<u>Ex. No.</u>	<u>Description of Exhibit</u>	<u>Provisionally Filed Under Seal</u>
1	Merits Expert Report of Facebook Expert Anindya Ghose, Ph.D.	Yes
2	Merits Expert Rebuttal Report of Facebook Expert Anindya Ghose, Ph.D.	Yes
3	Excerpts from the Deposition of Dr. Anindya Ghose, taken in <i>Klein v. Meta Platforms</i> on March 14, 2024	Yes

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 5th day of April, 2024 in Los Angeles, California.

By /s/ Adam B. Wolfson

Adam B. Wolfson

<sup>1</sup> Should the Court find it helpful, Consumers can submit any cited materials in full.

**ATTESTATION**

I, Kevin Y. Teruya, am the ECF user whose ID and password are being used to file the above document. In compliance with Local Rule 5-1(i)(3), I hereby attest that Adam B. Wolfson has concurred in the filing of the above document.

By /s/ Kevin Y. Teruya

Kevin Y. Teruya